

**DECLARATION OF ALFREDO JUAREZ ZEFERINO**

I, Alfredo Juarez Zeferino, hereby declare:

1. My name is Alfredo Juarez Zeferino (aka Alfredo Juarez Ceferino). I am twenty-five years old and am competent to testify regarding the matters described below. Based on DHS's allegations in my removal proceedings, I am a class member in this case. I can read, write, and understand English fluently. It is the language I use most and would say it is my best language.

2. I am currently detained at the Northwest Immigration and Customs Enforcement (ICE) Processing Center (NWIPC).

3. Prior to being detained, I lived in Sedro Woolley, Washington. I have lived in Washington State since 2012, when I was about 12 years old. I have lived in Mount Vernon, Burlington, and Sedro Woolley, all in Skagit County, Washington. I have also lived in Bellingham in Whatcom County for a time. I attended Burlington High School in Burlington, Washington until 2018. Before settling in Washington State I moved back and forth with my family between California and Washington while my parents worked in seasonal agricultural work.

4. I have 7 siblings. The youngest ones rely on me a lot: Alvaro is 18 years old, A is 14 years old, F is 12 years old, E is 10 years old, and E is 1 and a half years old. I lived with them and with my parents in Sedro Woolley until soon before I was detained by ICE in March of this year.

5. I have worked in agriculture, mostly berry harvesting and maintaining the plants and farms where they grow, since the summer when I was 13 years old. In Skagit County there are a lot of farms growing strawberries, blueberries, and blackberries. I also worked in

1 construction for a short time around 2019. I have worked and contributed to supporting myself  
2 and my siblings my whole adult life. I paid a lot of my family's expenses including rent, bills,  
3 and food. I am the oldest of all of my siblings. I most recently worked for Sakuma Brothers  
4 Farms in Burlington, Washington. I was also doing advocacy work with Community to  
5 Community of Development, which does organizing around farmworker rights and other issues  
6 as well.

7           6. I have never been arrested by the police, charged with a crime, or convicted of a  
8 crime. I have received about two tickets from the police and I have paid those. My only arrests  
9 by law enforcement have been by immigration agencies. First, in 2015 I was turned over to  
10 Customs and Border Protection (CBP) officers by the Bellingham Police after a traffic stop.  
11 Second, on March 25, 2025, I was arrested by officers of various Federal Agencies. I was pulled  
12 over while driving to work in the morning and there were multiple vehicles with around 5  
13 different officers. They surrounded my stopped car and told me to get out of my car. I asked why  
14 I was being stopped and if they had a warrant for my arrest. I rolled the window down enough so  
15 that I could talk to the officers and I got my identification out to show the officers. The officers  
16 did not show me a warrant for my arrest and after around one minute talking with me, one of the  
17 officers broke my car window. At that point I unlocked my car door and opened it. The officer  
18 took my license out of my hand and arrested me.

19           7. I learned I was being detained by Immigration and Customs Enforcement (ICE)  
20 and was transferred to NWIPC. I had previously been in removal proceedings but was scheduled  
21 for a hearing for which I did not receive notice and was ordered removed *in absentia* in 2018.

22           8. On April 11, 2025, an Immigration Judge in Seattle, Washington, reopened my  
23 proceedings based on my not having notice of the hearing which I did not attend as well as

1 saying I warranted reopening as a matter of discretion under his own *sua sponte* authority. I am  
2 currently in removal proceedings.

3 9. ICE has alleged in removal proceedings that I entered the United States without  
4 inspection.

5 10. On May 6, 2025, I requested a bond hearing before the immigration court. The  
6 hearing was held on May 8, 2025. At that hearing, the immigration judge concluded that she did  
7 not have jurisdiction to consider my case. She then also ordered, in the alternative, that I  
8 warranted a \$5,000 bond as I had requested of the Court if she did have jurisdiction.

9 11. My understanding is that I was denied release on bond because the IJ concluded I  
10 had entered the United States without inspection and therefore am subject to mandatory  
11 detention.

12 12. In support of my request for a bond, I submitted evidence regarding the support  
13 that I have from the community where I have lived for more than 10 years. I submitted 22 letters  
14 of support, including 7 from current city, county, and statewide elected officials. These letters  
15 talked about how active I am in my community advocating on behalf of farmworkers. I co-  
16 founded the labor union Familias Unidas por la Justicia (“Families United for Justice”) and I  
17 have been involved in getting labor protections in Washington State extended to farmworkers  
18 and specifically the berry workers in Skagit County. I also submitted proof of my US citizen  
19 siblings, the Immigration Judge’s orders reopening my removal proceedings, and public  
20 documents from this class action case.

21 13. I filed an appeal of the IJ’s decision denying me bond on May 9, 2025.

22 14. I understand that a bond appeal to the Board of Immigration Appeals (BIA) can  
23 take months, sometimes even 6 months. I am willing to fight my case in the immigration court,

1 but it is much harder to prepare for my case while I am detained, as I do not have access to  
2 helpful documents and requesting them is very difficult from detention. The judge said she  
3 would issue a bond of \$5,000 in my case if she had the jurisdiction to do that. Based on what my  
4 attorney has explained to me, I think that she does have the jurisdiction to do so, and I could  
5 immediately pay the \$5,000 bond if I am given the opportunity. I do not know if my immigration  
6 case will still be pending months from now when I could get a response from the BIA on my  
7 bond appeal. It feels like I do not really have the opportunity to appeal the judge's decision if it  
8 will take that long to get a response, since by then it might be too late for me to take advantage of  
9 my release to help me defend my immigration court case.

10 15. My continuing detention is causing me and my loved ones significant harm. Life  
11 in detention is tough. The detention center is very understaffed and this results in dangerous  
12 conditions. Once, after I had been detained for about two weeks, I and others were served  
13 uncooked chicken that still had blood in it. We sent it back because it would have made us sick. I  
14 have been served undercooked chicken more than once. Food like rice and beans are also  
15 regularly undercooked. We have been served frozen potatoes where you can see the ice. Our  
16 dinner often comes later than 10pm and one time we were served our third meal of the day at 1 in  
17 the morning.

18 16. The facility is so understaffed that there is sometimes one officer overseeing 3  
19 different pods. This could mean one officer is overseeing over 200 people. This happens  
20 regularly, especially on weekends. This scares me because sometimes there are fights and if there  
21 is only one officer overseeing so many people, they would not be able to stop it. I fear for my  
22 safety in detention.  
23

1           17.     Also due to understaffing, one time I sent my uniforms for laundry and was only  
2 returned one pair of socks and one pair of underwear. I did not get any of my shirts or a pair of  
3 sweatpants which I had sent to be cleaned. I had to wear the same clothing for almost a week  
4 before they returned my additional clothing.

5           18.     I have had to request to see a doctor one time while in detention. I was having  
6 issues with my vision due to the lights being on all of the time. I wanted eye drops or something  
7 that would give me relief. I was sent to medical but no one ever attended to me because they  
8 were understaffed that day. I am afraid that if I had another medical issue, or an emergency, there  
9 would be no one who could help me on time. I have heard from other men in detention that they  
10 have had trouble getting medical help even when faced with very serious medical conditions.

11           19.     Being detained is also hard on me emotionally. I have only been detained once  
12 before, when I was arrested by ICE as a teenager. As I explain above, the experience is  
13 dehumanizing, from being given dangerously undercooked food to being forced to wear the same  
14 dirty clothes for one week. I am used to being outside, in the fields, talking to other farmworkers,  
15 but here I am forced to being inside for 24 hours/day.

16           20.     I also worry about my parents, and especially my siblings. I was helping my  
17 family a lot through my work, and my family really relied on that. Shortly before I was detained  
18 my siblings moved with my parents out of Washington State. I know doing this was very  
19 destabilizing for them, and I want them to return to the community where they have lived their  
20 entire lives and to attend the same schools where they went before with their friends. They  
21 cannot do that while I am detained.

1           21. I also want to return to my advocacy work on behalf of farm workers. We have  
2 accomplished a lot for farm worker rights and I want to continue that because there is still a lot  
3 of work to do. I want to help create a stable work force which the economy of the US needs.  
4

5           I, Alfredo Juarez Zeferino, declare under penalty of perjury of the laws of the State of  
6 Washington and the United States that the foregoing is true and correct to the best of my  
7 knowledge and belief.  
8

9 Executed in Tacoma, Washington on May 13, 2025.

10  
11 By:  \_\_\_\_\_

Alfredo Juarez Zeferino